IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

THE EQUAL RIGHTS CENTER,	*	
Plaintiff,	*	
v.	*	**Civil Action No. 8:10-cv-2400-DKC**
	*	**Hon. Deborah K. Chasanow**
LERNER ENTERPRISES, et al.,	*	
Defendants.	*	

*   *   *   *   *   *   *   *   *   *   *   *   *

JOINT MOTION FOR APPROVAL AND ENTRY OF CONSENT DECREE

The Equal Rights Center and Lerner Enterprises, *et al.* have entered into a Consent

Decree intended to resolve this litigation. The parties hereby jointly move the Court for approval

and entry of the Consent Decree, attached hereto as Exhibit A.

Dated: September 21, 2011   Respectfully submitted,

                                   ___/s/ Derek Y. Sugimura_____
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                                   Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that I have this 21st day of September, 2011, caused a true and correct copy of the foregoing document to be filed with the Court's CM/ECF system. I further certify that I have caused a true and correct copy of the foregoing document to be sent via U.S. Mail first-class, postage prepaid, to:

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